



## TELECOMMUNICATIONS

Mississippi State  
UNIVERSITY

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

February 10, 2000

Chairman William E. Kennard  
Federal Communications Commission  
Room 8-B201  
445 Twelfth Street, S.W.  
Washington, DC 20554

fax: (202) 418-2801

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile  
Radio Services

Dear Chairman Kennard

As a member of ACUTA, the association of telecommunications professionals in higher education, Mississippi State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Mississippi State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Mississippi State University currently has over 16,000 students and 4,000 full-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized telephone system controlled by the telecommunications department. Our existing system can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her residence hall room, the system recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our system will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the systems we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

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Thomas R. Lindsay  
Director, Telecommunications

cc: Mr. Ari Fitzgerald, Legal Advisor to Chairman Kennard



## TELECOMMUNICATIONS



February 10, 2000

Commissioner Susan Ness  
Federal Communications Commission  
Room 8-B115  
445 Twelfth Street, S.W.  
Washington, DC 20554

fax: (202) 418-2821

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Ness

As a member of ACUTA, the association of telecommunications professionals in higher education, Mississippi State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Mississippi State University to significant financial liability that would undermine our ongoing effort to provide educational services.

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Thomas R. Lindsay  
Director, Telecommunications

cc: Mr. Mark Schneider, Senior Legal Advisor to Commissioner Ness



## TELECOMMUNICATIONS



February 10, 2000

Commissioner Harold W. Furchtgott-Roth  
Federal Communications Commission  
Room 8-A302  
445 Twelfth Street, S.W.  
Washington, DC 20554

fax: (202) 418-2802

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile  
Radio Services

Dear Commissioner Furchtgott-Roth

As a member of ACUTA, the association of telecommunications professionals in higher education, Mississippi State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Mississippi State University to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,

A handwritten signature in cursive script, reading "Thomas R. Lindsay".

Thomas R. Lindsay  
Director, Telecommunications

cc: Bryan Tramont, Legal Advisor to Chairman Furchtgott-Roth

February 10, 2000

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, S.W.  
Washington, DC 20554

fax: (202) 418-2820

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile  
Radio Services

Dear Commissioner Powell

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Sincerely,

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Thomas R. Lindsay  
Director, Telecommunications

cc: Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell



February 10, 2000

Commissioner Gloria Tristani  
Federal Communications Commission  
Room 8-C302  
445 Twelfth Street, S.W.  
Washington, DC 20554

fax: (202) 418-7542

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile  
Radio Services

Dear Commissioner Tristani

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Thomas R. Lindsay  
Director, Telecommunications

cc: Adam Krinsky, Legal Advisor to Commissioner Tristani



## TELECOMMUNICATIONS



February 10, 2000

Mr. Thomas Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C252  
445 Twelfth Street, S.W.  
Washington, DC 20554

fax: (202) 418-0787

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Sugrue

As a member of ACUTA, the association of telecommunications professionals in higher education, Mississippi State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Mississippi State University to significant financial liability that would undermine our ongoing effort to provide educational services.

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Thomas R. Lindsay  
Director, Telecommunications

February 10, 2000

Mr. James D. Schlichting  
Deputy Bureau Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C254  
445 Twelfth Street, S.W.  
Washington, DC 20554

fax: (202) 418-0787

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile  
Radio Services

Dear Mr. Schlichting

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Thomas R. Lindsay  
Director, Telecommunications

February 10, 2000

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, S.W.  
Washington, DC 20554

fax: (202) 418-7247

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile  
Radio Services

Dear Mr. Levin

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We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our system could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the systems we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

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Thomas R. Lindsay  
Director, Telecommunications



February 10, 2000

Mr. David Siehl  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-A164  
445 Twelfth Street, S.W.  
Washington, DC 20554

fax: (202) 418-7247

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Siehl

As a member of ACUTA, the association of telecommunications professionals in higher education, Mississippi State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Mississippi State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Mississippi State University currently has over 16,000 students and 4,000 full-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized telephone system controlled by the telecommunications department. Our existing system can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her residence hall room, the system recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our system will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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February 10, 2000

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Thomas R. Lindsay  
Director, Telecommunications

February 10, 2000

Ms. Kris Monteith  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C122  
445 Twelfth Street, S.W.  
Washington, DC 20554

fax: (202) 418-7247

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile  
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Thomas R. Lindsay  
Director, Telecommunications